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*Attorneys for Plaintiff*

UNITED STATES DISTRICT COURT

DISTRICT OF ARIZONA

Valentino Dimitrov, individually, and on  
behalf of all others similarly situated;

Plaintiffs,

vs.

Stavatti Aerospace, Ltd, a Minnesota  
corporation; Stavatti Aerospace, Ltd, a  
Wyoming corporation; Stavatti  
Corporation, a Minnesota corporation;  
Stavatti Immobiliare, Ltd, a Wyoming  
corporation; Stavatti Industries, Ltd, a  
Wyoming corporation; Stavatti Niagara,  
Ltd, a New York corporation Stavatti  
Super Fulcrum, Ltd, a Wyoming  
corporation; Stavatti Ukraine, a Ukrainian  
business entity; Stavatti Heavy Industries  
Ltd, a Hawaii corporation; Christopher  
Beskar and Maja Beskar, husband and  
wife; John Simon and Jean Simon,  
husband and wife; William Mcewen and  
Patricia Mcewen, husband wife; Rudy  
Chacon and Jane Doe Chacon, husband  
and wife; and DOES 1 through 10,  
inclusive,

Defendants.

Case No.: 2:23-CV-00226-PHX-DJH

**DECLARATION OF PLAINTIFF  
VALENTINO DIMITROV IN SUPPORT  
OF MOTION TO EXTEND TIME  
FOR ALTERNATIVE SERVICE UPON  
DEFENDANT RUDY CHACON**

1 I, Valentino Dimitrov, declare under penalty of perjury that the following is true  
2 and correct:

3 1. I am the Plaintiff in this matter.

4 2. All statements in the Complaint are true to the best of my knowledge.

5 3. All exhibits attached to the Complaint are accurate to the best of my  
6 knowledge.

7 4. In my dealings with Rudy Chacon ("Mr. Chacon") he always presented  
8 himself to be a well-resourced, sophisticated, and professional with a high level of  
9 knowledge of legal and financial rules and regulations.

10 5. I personally called Mr. Chacon in January 2023 prior to filing the Complaint  
11 to inform him that I would be pursuing litigation against the Defendants in this case,  
12 including Mr. Chacon, if we were unable to come up with a resolution.

13 6. When I asked Mr. Chacon about his fraudulent actions during my phone call  
14 in January 2023, he indifferently stated something like "these things happen".

15 7. I have met with Mr. Chacon in person on multiple separate occasions in  
16 2022, with every meeting occurring in California.

17 8. As an Arizona resident myself, when discussing in person with Mr. Chacon  
18 my being a resident of Arizona, Mr. Chacon never asserted or represented that he has ever  
19 owned any property or lived in Arizona.

20 9. In direct conversations with Mr. Chacon, he has told me that he is a resident  
21 of California.

22 10. During my discussions with Mr. Chacon in 2022, he informed me of his  
23 multiple international entities and properties, including his own foreign residence in Costa  
24 Rica.

25 ///

13. Given Mr. Chacon's decades of physical and business nexus to California, and his lack of any discernable residence to Arizona, I respectfully ask that you to allow for alternative service upon Mr. Chacon at his California address.


By: /s/ Valentino Dimitrov



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